FILE

IN THE CIRCUIT COURT FOR PRINCE GEORGE'S COUNTY

ORSERY CORDICE *
c/o George Harper
14744 Main Street
Upper Marlboro, MD 20772

Plaintiff *

vs. CAL CAL13-25095

SHOPPERS FOOD WAREHOUSE CORP.
11840 VALLEY VIEW RD *
EDEN PRAIRIE, MN 55344
SDAT Dept ID #: F13036124

SERVE UPON:
THE CORPORATION TRUST *
INCORPORATED
351 WEST CAMDEN STREET
BALTIMORE, MD 21201

Defendant *

PR GEO CO MD #73
2013 SEP -3 PM 1:55
Clerk of the Circuit Court

and

SHOPPERS FOOD WAREHOUSE CORP.
4600 FORBES BLVD * Case No. ______________
LANHAM, MD 20706
SDAT Dept ID #: F00026146

SERVE UPON:
THE CORPORATION TRUST *
INCORPORATED
300 E LOMBARD STREET
BALTIMORE, MD 21201

Defendant *

and

SHOPPERS FOOD WAREHOUSE MD CORP.
4600 FORBES BLVD *
LANHAM, MD 20706
SDAT Dept ID #: D00126219

SERVE UPON:
ROBERT N. HERMAN *
4600 FORBES BLVD
LANHAM, MD 20706

Defendant

COMPLAINT
AND DEMAND FOR TRIAL BY JURY

COMES NOW the Plaintiff, ORSERY CORDICE, by and though her attorneys, George Harper and Ronald Cooper, and sues SHOPPERS FOOD WAREHOUSE CORP., of Eden Prairie, Minnesota, SHOPPERS FOOD WAREHOUSE CORP., of Lanham, Maryland, and SHOPPERS FOOD WAREHOUSE MD CORP., and for her cause and causes of action, says as follows:

PARTIES
AND JURISDICTION

1. The Plaintiff is a citizen and a resident of Prince George's County, Maryland;
2. Defendant SHOPPERS FOOD WAREHOUSE CORP., of Eden Prairie, Minnesota (hereinafter, "SHOPPERS OF MINNESOTA"), is a corporation, organized under the laws of Minnesota, doing business in Maryland, with a Principal Office at 11840 VALLEY VIEW RD, EDEN PRAIRIE, MN 55344, and a Resident Agent known as THE CORPORATION TRUST INCORPORATED, 351 WEST CAMDEN STREET, BALTIMORE, MD 21201;
3. Defendant SHOPPERS FOOD WAREHOUSE CORP. of Lanham, Maryland (hereinafter, "SHOPPERS OF LANHAM"), is a corporation, organized under the laws of the State of Maryland, doing business in Maryland, with a Principal Office at 4600 FORBES BLVD, LANHAM, MD 20706, and a Resident Agent, THE CORPORATION TRUST, INCORPORATED, 351 WEST CAMDEN STREET, BALTIMORE, MD 21201;
4. Defendant SHOPPERS FOOD WAREHOUSE MD CORP. (Hereinafter, "SHOPPERS MD"), is a corporation, apparently organized under the laws of the State of Maryland, doing business in Maryland, with a Principal Office at 4600 FORBES BLVD, LANHAM, MD 20706, and a Resident Agent, ROBERT N. HERMAN, 4600 FORBES BLVD, LANHAM, MD 20706;

JURISDICTION

5. This Honorable Court has jurisdiction over this complaint under CJ§ 6-103 (b), Md.Ann.Code, because the causes of action and the Plaintiff's injuries arose in this state;
6. This Honorable Court has jurisdiction over this complaint under CJ§ 6-102 (a), Md.Ann.Code, because the Defendants all either are domiciled in this state, regularly do business in this state, maintain an office in this state, and/or are residents and citizens of Prince George's County, Maryland;

VENUE

7. This Honorable Court is the appropriate venue, as the Plaintiff and two of the Defendants are residents of his county, and the causes of action and the Plaintiff's injuries arose in this county;

FACTS
COMMON TO ALL COUNTS

8. At all relevant times, the defendants SHOPPERS OF MINNESOTA, SHOPPERS OF LANHAM, and/or SHOPPERS MD, by and through their agents, servants, and/or employees; own, lease, and or

operate a business known as Shoppers food Warehouse, at 6111 Livingston Rd, Oxon Hill, MD 20745;

9. At all relevant times, the defendants SHOPPERS OF MINNESOTA, SHOPPERS OF LANHAM, and/or SHOPPERS MD, by and through their agents, servants, and/or employees; advertised in the media, such as newspapers, radio, television, and the internet, in order to attract retail customers, whom they invited into their stores, including a business known as Shoppers food Warehouse, at 6111 Livingston Rd, Oxon Hill, MD 20745;

10. On or about 4 September 2010, the Plaintiff was a customer and a business invitee upon the premises at the business known as Shoppers food Warehouse, at 6111 Livingston Rd, Oxon Hill, MD 20745

11. The Plaintiff had been invited upon those premises by defendants SHOPPERS OF MINNESOTA, SHOPPERS OF LANHAM, and/or SHOPPERS MD, by and through their agents, servants, and/or employees;

12. The Plaintiff had been so invited onto the property for purposes related to the business of defendants SHOPPERS OF MINNESOTA, SHOPPERS OF LANHAM, and/or SHOPPERS MD, by and through their agents, servants, and/or employees, namely, to purchase products sold by the aforesaid defendants upon those premises;

COUNT ONE
NEGLIGENCE
(Premises Liability)

13. The Plaintiff realleges, reaffirms, and incorporates herein by reference thereto all of the allegations made above;

14. The aforesaid defendants SHOPPERS OF MINNESOTA, SHOPPERS OF LANHAM, and/or SHOPPERS MD, by and through their agents, servants, and/or employees, owed to the Plaintiff the duty to use reasonable care to see that those portions of the property which the invitee Plaintiff might have been expected to have used were safe;

15. The aforesaid defendants SHOPPERS OF MINNESOTA, SHOPPERS OF LANHAM, and/or SHOPPERS MD, by and through their agents, servants, and/or employees, breached the aforesaid duty, by failing to use reasonable care to see that those portions of the property which the invitee Plaintiff might have been expected to have used, and which the Plaintiff did in fact use, were safe;

16. The aforesaid defendants SHOPPERS OF MINNESOTA, SHOPPERS OF LANHAM, and/or SHOPPERS MD, by and through their agents, servants, and/or employees, breached the aforesaid duty, by carelessly and negligently allowing puddles of water and/or liquid to collect and to remain on the floor, in an area which the invitee Plaintiff might have been expected to have used, and which the Plaintiff did in fact use;

17. As a proximate and foreseeable consequence of the aforesaid negligence, the Plaintiff, who did not see the puddles of water and/or liquid, slipped upon the aforesaid substance, and fell, injuring herself;

18. As a further proximate and foreseeable consequence of the aforesaid negligence, the Plaintiff was

caused to suffer numerous, severe, permanent, and disabling injuries, physical pain, and mental and emotional trauma, pain, and anguish, all of which required the services of health care providers, at the expense of the Plaintiff, was caused to lose time and wages from vocations and avocations, all to her general detriment, and all without any negligence, want of due care, justification, excuse, assumption of risk, cause, or consent, on the part of the Plaintiff, contributing, directly or indirectly, thereto;

WHEREFORE, your Plaintiff, demands judgment of and from the defendants SHOPPERS OF MINNESOTA, SHOPPERS OF LANHAM, and/or SHOPPERS MD, by and through their agents, servants, and/or employees jointly and severally, in the amount of One Million Dollars ($1,000,000.00) compensatory damages, plus the costs of this suit, including such interest and attorneys fees as are legally allowable.

by: ______________________

GEORGE HARPER
Attorney for the Plaintiff
14744 Main Street, Suite 101
Upper Marlboro, Maryland 20772
(301) 627-2700

ELECTION FOR TRIAL BY JURY

COMES NOW the Plaintiff, by and through counsel, and hereby demands trial by jury as to each and every issue raised herein.

by: ______________________

GEORGE HARPER
Attorney for the Plaintiff